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Attorneys for Plaintiffs
BRIGHTHOUSE LIFE INSURANCE COMPANY,
METROPOLITAN LIFE INSURANCE COMPANY,
and METLIFE REAL ESTATE LENDING, LLC

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA - FRESNO DIVISION

METROPOLITAN LIFE INSURANCE
COMPANY, a New York corporation,

Plaintiff,

v.

ACDF, LLC, a California limited liability
company, *et al.*,

Defendants.

Lead Case No. 1:24-cv-01261-KES-SAB

Consolidated with Case Nos:
1:24-cv-01226; 1:24-cv-01230;
1:24-cv-01231; 1:24-cv-01232;
1:24-cv-01233; 1:24-cv-01235; and
1:24-cv-01241

JOINT STATUS REPORT

Honorable Magistrate Stanley A. Boone

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- ☒ Affects All Cases
☐ Affects Metropolitan Life Ins. Co. v. ACDF,
LLC, et al., 1:24-cv-01261
☐ Affects Metropolitan Life Ins. Co. v. FNF
Farms, LLC, et al., 1:24-cv-01226
☐ Affects Metropolitan Life Ins. Co. v. C & A
Farms, LLC, et al., 1:24-cv-01230
☐ Affects Metropolitan Life Ins. Co. v.
Maricopa Orchards, LLC, et al., 1:24-cv-
01231
☐ Affects Brighthouse Life Ins. Co. v. Kamm
South, LLC, et al., 1:24-cv-01232
☐ Affects Brighthouse Life Ins. Co. v.
Manning Avenue Pistachios, LLC, et al.,
1:24-cv-01233 Case No. 1:24-cv-01233
☐ Affects Brighthouse Life Ins. Co. v. ACDF,
LLC, et al., 1:24-cv-01235
☐ Affects MetLife Real Estate Lending, LLC
v. Panoche Pistachios, LLC, et al., 1:24-cv-
01241

1 Plaintiffs Brighthouse Life Insurance Company, Metropolitan Life Insurance Company, and
 2 MetLife Real Estate ending, LLC (collectively, “Plaintiffs”) filed eight Complaints¹ alleging
 3 Defendants’ breach of loan agreements and guaranty agreements under the respective loan
 4 documents, as defined in the pleadings.² The cases were administratively consolidated on
 5 December 12, 2024 with Case No. 1:24-cv-01261-KES-SAB as the Lead Case. (ECF No. 54.)

6 Pursuant to the Court’s October 6, 2025 Orders³, the undersigned counsel for Plaintiffs and
 7 Defendants⁴ (collectively, the “Parties”) respectfully submit the following Joint Status Report and
 8 request a 90-day continuance of the Initial Scheduling Conference.

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13 ¹ *Metropolitan Life Ins. Co. v. FNF Farms, LLC, et al.*, 1:24-cv-01226; *Metropolitan Life Ins. Co.*
 14 *v. C & A Farms, LLC, et al.*, 1:24-cv-01230; *Metropolitan Life Ins. Co. v. Maricopa Orchards,*
 15 *LLC, et al.*, 1:24-cv-01231; *Brighthouse Life Ins. Co. v. Kamm South, LLC, et al.*, 1:24-cv-01232;
 16 *Brighthouse Life Ins. Co. v. Manning Avenue Pistachios, LLC, et al.*, 1:24-cv-01233; *Brighthouse*
Life Ins. Co. v. ACDF, LLC, et al., 1:24-cv-01235; *MetLife Real Estate Lending, LLC v. Panoche*
Pistachios, LLC, et al., 1:24-cv-01241; *Metropolitan Life Ins. Co. v. ACDF, LLC, et al.*, 1:24-cv-
 01261.

17 ² See Complaints, Loan Documents: 1:24-cv-01261 (ECF No. 1, Factual Background, section A);
 18 1:24-cv-01226 (ECF No. 1, Factual Background, section A); 1:24-cv-01230 (ECF No. 1, Factual
 19 Background, section A); 1:24-cv-01231 (ECF No. 1, Factual Background, section A); 1:24-cv-
 20 01232 (ECF No. 1, Factual Background, section A); 1:24-cv-01233 (ECF No. 1, Factual
 Background, section A); 1:24-cv-01235 (ECF No. 1, Factual Background, section A); and 1:24-cv-
 01241 (ECF No. 1, Factual Background, section A).

21 ³ See Orders: 1:24-cv-01261 (ECF No.178); 1:24-cv-01226 (ECF No. 35); 1:24-cv-01230 (ECF
 22 No. 70); 1:24-cv-01231 (ECF No. 35); 1:24-cv-01232 (ECF No. 36); 1:24-cv-01233 (ECF No. 38);
 1:24-cv-01235 (ECF No.39); and 1:24-cv-01241 (ECF No. 35).

23 ⁴ Defendants Maricopa Orchards, LLC; ACDF, LLC, as successor by merger to 104 Partners, LLC;
 24 Willow Avenue Investments, LLC; Ashlan & Hayes Investments, LLC; Grantor Fresno Clovis
 25 Investments, LLC; Maricopa Orchards, LLC; Manning Avenue Pistachios, LLC; C & A Farms,
 26 LLC; Cantua Orchards, LLC; FNF Farms, LLC; Panoche Pistachios, LLC; Kamm South, LLC;
 27 Donald E. Schramm and Nada L. Schramm Revocable Trust Dated 12/2/2010; The Thomsen
 28 Family Trust Dated 11/24/2010; Daniel L. Sweet, an individual; Carole A. Sweet, an individual;
 Donald E. Schramm, an individual; Nada L. Schramm, an individual; Keith A. Thomsen, an
 individual; the testate and intestate successors of Catherine S. Thomsen, deceased, and all persons
 claiming by, through or under such decedent; Farid Assemi, an individual; Farshid Assemi, an
 individual; and Darius Assemi, an individual (collectively, the “Defendants”). As of the time of
 this filing, counsel for Plaintiffs did not receive a response or signature authorization from counsel
 for Dumar, LLC and Pistache, LLC.

I. STATUS OF SERVICE AND APPEARANCES

All Defendants have been served with the respective Complaints, and all Defendants have answered. Plaintiff Metropolitan Life Insurance Company provides further clarification on the status of certain Defendants in two of its cases discussed in the Court's Orders:

In its October 6, 2025 Order in Case No. 1261, the Court noted that two defendants, Ashlan & Hayes Investments, LLC and Grantor Fresno Clovis Investments, LLC have not appeared (ECF No. 178). Plaintiff Metropolitan Life Insurance Company respectfully notes that Ashlan & Hayes Investments, LLC and Grantor Fresno Clovis Investments, LLC submitted an Answer on April 30, 2025 (ECF No. 140) and are currently represented by Wanger Jones Helsley PC (ECF No. 160).

In its October 6, 2025 Order in Case No. 1230, the Court observed that one defendant on the docket, Darius Assemi (in his individual capacity) has not appeared (ECF No. 140). Plaintiff Metropolitan Life Insurance Company respectfully notes that this is an error on the Parties' part. On November 4, 2024, Plaintiff dismissed Darius Assemi as Trustee of the AMENDED AND RESTATED DARIUS ASSEMI REVOCABLE TRUST, dated March 2, 2010. (ECF No. 33.) Darius Assemi, in his individual capacity, remained a defendant. (*Id.*) Darius Assemi submitted an Answer on May 9, 2025 (ECF No. 62), which was filed on behalf of Darius Assemi both as an individual *and* Trustee, but should have been filed on behalf of Darius Assemi as an individual only, not Trustee, since Darius Assemi in his capacity as Trustee was previously dismissed.

II. REQUEST FOR CONTINUANCE

The Parties respectfully request a 90-day continuance (to January 26, 2026) of the Initial Scheduling Conference. A sale of real property was approved by the Court on September 24, 2025 in Case No. 1231 (see ECF No. 173), and additional sales in other cases may be forthcoming. These developments are expected to significantly narrow the scope of the discovery plan and the issues to be addressed at the Initial Scheduling Conference. Given the complexity of these multi-party proceedings, the Parties request additional time to meet and confer on a discovery plan, case schedule, and the matters at issue in the various cases.

1 DATED: October 10, 2025

STOEL RIVES LLP

2
3 /s/ Michelle J. Rosales

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8 *Attorneys for Plaintiffs*

BRIGHOUSE LIFE INSURANCE
COMPANY, METROPOLITAN LIFE
INSURANCE COMPANY, and METLIFE
REAL ESTATE LENDING, LLC

9
10 DATED: October 10, 2025

WANGER JONES HELSEY PC

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12 /s/ Ian J. Quinn

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13 IAN J. QUINN, Bar No. 342754
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14
15
16 *Attorneys for Defendants*

17 ACDF, LLC; C&A FARMS, LLC; CANTUA
ORCHARDS, LLC; FNF FARMS, LLC;
18 KAMM SOUTH, LLC; MARICOPA
ORCHARDS, LLC; ASHLAN & HAYES
INVESTMENTS, LLC; PANOCHÉ
19 PISTACHIOS, LLC; WILLOW AVENUE
INVESTMENTS, LLC; MANNING AVENUE
20 PISTACHIOS, LLC; GRANTOR FRESNO
CLOVIS INVESTMENTS, LLC

21 DATED: October 10, 2025

22 LEVENE, NEALE, BENDER, YOO &
GOLUBCHIK LLP

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24 /s/ Richard D. Steelman

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27 *Attorneys for Defendants*

FARID ASSEMI, an individual, and FARSHID
ASSEMI, an individual.

1 DATED: October 10, 2025

MOJDEHI GALVIN REGO LLP

2 /s/ Ali M. Mojhehi

3 ALI M. MOJDEHI, Bar No. 123846
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5 *Attorneys for Defendants*

DARIUS ASSEMI, an individual

6 DATED: October 10, 2025

BAKER MANOCK & JENSEN, PC

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10 *Attorneys for Defendants*

11 DONALD E. SCHRAMM AND NADA L.
12 SCHRAMM REVOCABLE TRUST DATED
13 12/2/2010; THE THOMSEN FAMILY TRUST
14 DATED 11/24/2010; DANIEL L. SWEET, AN
15 INDIVIDUAL; CAROLE A. SWEET, AN
16 INDIVIDUAL; DONALD E. SCHRAMM, AN
17 INDIVIDUAL; NADA L. SCHRAMM, AN
18 INDIVIDUAL; KEITH A. THOMSEN, AN
19 INDIVIDUAL; THE TESTATE AND
20 INTESATE SUCCESSORS OF
21 CATHERINE S. THOMSEN, DECEASED,
22 AND ALL PERSONS CLAIMING BY,
23 THROUGH OR UNDER SUCH DECEDENT

24 **ATTESTATION UNDER L.R. 131(c)**

25 Pursuant to Civil Local Rule 131(c), I attest under the penalty of perjury that the above
26 signatories authorized the use of an electronic signature and concurred in the filing of this
27 document.
28

DATED: October 10, 2025

/s/ Michelle J. Rosales

MICHELLE J. ROSALES